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The Lee County Emergency Management Agency has serious concerns regarding the proposed public use of the 1675-1710 MHz band as described in FCC Docket 10-123. This frequency range is used by the National Oceanic and Atmospheric Administration (NOAA) GOES (Geostationary Operational Environmental Satellites) and POES (Polar-orbiting Operational Environmental Satellites) meteorological weather satellites. Numerous direct readout ground stations across the United States receive weather data from these NOAA satellites in various formats, such as GVAR, LRIT, EMWIN, and HRPT. Public use of this frequency range presents a potential conflict to this multi-million dollar infrastructure.

In particular, the EMWIN data stream is the primary means used by this Agency to provide the absolute fastest means possible to alert citizens and agencies of LIFE THREATENING SEVERE WEATHER. Though our County is covered by the NOAA Weather radio system, our Agency's use of the EMWIN data stream far exceeds the reach and application of that broadcast.

Addressing the specific questions in Docket 10-123 affecting the Lee County Emergency Management Agency:

1. A description of the utility of the 1675-1710 MHz band for wireless broadband services, including any
pairing, band plan, or other licensing approaches that would maximize this utility:

We cannot specifically speak to the proposed use of subject wireless broadband services. However, such use, particularly in an RF rich environment in a mid to highly populated area, would undoubtedly cause significant interference directly affecting reliable and timely use of the EMWIN data stream.

2. Identity of the non-federal entities accessing the services operating in the 1675-1710 MHz band:

Lee County Emergency Management Agency, other County agencies, first responders, hospitals, storm spotters, schools, childcare centers, businesses and general public.

3. A description of the purpose of such use (i.e., the equipment is used to support TV weather forecasting or for conducting university research):

Automatic activation of outdoor warning sirens, automatic retransmission of the warning via County owned VHF radio warning system; automatic short and full text messaging and paging to first responders, hospitals, storm spotters, child care centers, County agencies, businesses, schools, etc. UHF radio rebroadcast of the EMWIN data stream to police, fire, EMS, hospitals, storm spotters, schools, and others.

4. Which portions of the 1675-1710 MHz band are used:

1690 MHz (EMWIN data stream)

5. How often the service is used (e.g., every day, scheduled times of day, duration, etc.):

Data are ingested 24 hours/day, 7 days/week, 365 days/year

6. An estimate of the current investment in wireless equipment, including when it was obtained and put into use:

Since about 1995, Lee County has budgeted and spent (along with applicable grants) approximately $60,000 on EMWIN related receiving, processing, and retransmission equipment.

7. A description of whether and how the information and services currently accessed can be obtained from other means; and if so, the anticipated costs and timeframes for implementing any alternatives:

EMWIN is available over the internet. However, it cannot be depended upon during an emergency nor is it as timely as direct satellite reception. This has been proven time and time again. The EMWIN data stream is a free. There are commercial satellites that carry NWS products typically running $125 to $150 a month. This is not acceptable. Our citizens pay taxes for the NWS to issue products which, it would seem, we would now have to pay additional dollars for the same information from a commercial vendor who gets the information free with little guarantee of accuracy or timeliness of delivery.

8. Confirmation that, if the information currently available from the meteorological satellite service

were
received at only a few receive sites and distributed via terrestrial services, this would be a functionally equivalent substitute for the direct reception of the satellite and radiosonde services;

We cannot confirm this assertion. Data latency is the critical element in getting a warning out. Any introduction of a 'relay' 'somewhere' will always result in delay, a delay that can cost lives. We have no idea what the cost of such a facility would be that could do the job as quickly and as efficiently as direct Satellite reception. Nor do we have any idea what equipment we would have to purchase or at what cost. Suffice to say, it will be expensive.

9. Any other information interested parties would like to identify regarding use of the meteorological satellite and radiosonde services:

The NWS has, over the last 10-15 years or so, greatly improved its accuracy and timeliness in getting warnings out to the public. With the introduction of EMWIN, around 1995, came the opportunity for local Emergency Management officials, on a very small budget, to receive, process and apply text copies of the warning product even by the time it was being heard over NOAA weather radio. EMWIN opened many doors for software vendors to use the data stream for automatic features such as printing, email, paging, logging, archiving, mapping, etc; and most recently the ability to automatically activate outdoor warning sirens - all at a reasonable price; especially important for so many of the small counties around the Country who have little income. Direct reception via Satellite is the only way to maintain and grow these critical capabilities. The NWS has just turned on a new EMWIN Satellite with a data stream running at 19.2 K vs the old 9600 baud rate capability. This higher speed, with new and better products, will enable Emergency Managers to better serve their communities. Without EMWIN satellite, we regress to the 1990s.

Respectfully,

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